1 2 3 4 5 6 7 8 9 10	BERGER & MONTAGUE, P.C.  Eric L. Cramer (admitted pro hac vice) Michael Dell'Angelo (admitted pro hac vice) Patrick F. Madden (admitted pro hac vice) 1622 Locust Street Philadelphia, PA 19103 Telephone: (215) 875-3000 Fax: (215) 875-4604 ecramer@bm.net mdellangelo@bm.net pmadden@bm.net  (Additional counsel appear on signature page)  Co-Lead Counsel for the Classes and Attorneys for Individual and Representative Plan Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez, Brandon Vera, and Kyle Kingsbury	intiffs			
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13	UNITED STATES I	DISTRICT COURT			
14	DISTRICT O	DISTRICT OF NEVADA			
15 16	Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury on behalf of themselves and all others similarly situated,	Case No.: 2:15-cv-01045-RFB-(PAL)  PLAINTIFFS' MOTION FOR LEAVE TO LODGE MATERIALS UNDER SEAL			
17	·	TO LODGE WATERIALS UNDER SEAL			
18	Plaintiffs, v.				
19 20	Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC,				
21	Defendant.				
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1	Pursuant to Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure and Section 14.3	
2	of the Revised Stipulation and Protective Order issued by this Court on February 10, 2016 (ECF	
3	No. 217 at 15), Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis Javier Vazquez,	
4	and Kyle Kingsbury on behalf of themselves and all others similarly situated (collectively,	
5	"Plaintiffs"), hereby move this Court for leave to lodge certain documents under seal related to	
6	their Reply in Support of Motion to Compel Defendant to Produce a Log of Communications for	
7	Dana White's Discoverable Telephone Numbers and Electronic Communication Devices and	
8	Directing Defendant to Submit an Inventory of Electronic Communication Devices.	
9	First, Plaintiffs seek leave to lodge under seal Exhibits 38-39 to Plaintiffs' Reply, which	
10	contain portions of text message compilations produced on behalf of Defendant's custodians.	
11	Second, Plaintiffs seek leave to lodge under seal portions of Exhibit 41 to Plaintiffs'	
12	Memorandum of Law, which contains confidential correspondence between the parties' counsel.	
13	Plaintiffs have filed these documents, in accordance with the Court's ECF system, with the	
14	instant motion. Plaintiffs have filed placeholders for these documents with the Court, and will	
15	serve un-redacted versions of these documents on Defendant.	
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17	DATED: May 31, 2017 /s/ Michael Dell'Angelo	
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	DI AINTHEES! MOTION FOR LEAVE TO LODGE MATERIAL CUMPER SEAL

1	CERTIFICATE OF SERVICE
2	I hereby certify that on this 31st day of May, 2017 a true and correct copy of <b>PLAINTIFFS' MOTION TO LODGE MATERIALS UNDER SEAL</b> was served via email on
3	all parties or persons requiring notice.
4	/s/ Michael Dell'Angelo
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	PLAINTIFFS' MOTION FOR LEAVE TO LODGE MATERIALS UNDER SEAL